

REMARKS

The Office Action dated February 10, 2011 has been received and carefully noted. The above amendments and the following remarks are being submitted as a full and complete response thereto. Claims 1-6, 8-13, 22-27, 29-34, 43-54 and 59-62 are pending. By this Amendment, Claims 1, 8, 11, 22, 29, 32, 43, 51, and 52 are amended. The Applicants respectfully submit that no new matter is presented herein. Reconsideration of the application in view of the above amendments and the following remarks is respectfully requested.

Information Disclosure Statement

The Office Action states the information disclosure statement (IDS) filed on January 21, 2011 fails to comply with 37 CFR 1.98 (a)(2), which requires a legible copy of each cited foreign patent document. The Applicants respectfully request that the Examiner consider the references not considered on the January 21, 2011, IDS, i.e., the references that have been lined through on the SB/08a forms enclosed with the Office Action.

The Applicants submitted copies of the references along with the IDS filed on January 21, 2011. Upon reviewing the above-identified application using the Patent Application Information (PAIR) private database on the U.S. Patent and Trademark Office website, copies of all of the references are present in the database and dated January 21, 2011.

Accordingly, the Applicants respectfully request that the Examiner consider the remaining references from the January 21, 2011, IDS. Copies of the SB/08a form are enclosed for the Examiner's convenience.

Claim Rejections -- 35 U.S.C. 112, First Paragraph

Claims 1, 8, 11, 22, 29, 32, 43 and 51 are rejected under 35 U.S.C. 112, first paragraph, as failing to comply with the enablement and written description requirements. The Applicants respectfully traverse the rejection as follows.

The Office Action, on pages 2-3, alleges that the "specification doesn't adequately describe how the library performs the conversion as now claimed" and that "the claim where the conversion occurs by the library is new matter." The Applicants respectfully disagree.

In particular, the originally filed specification discloses at least on page 45, lines 21-26 that the "manual text-to-speech routine 1130 may be implemented within . . . the library 262 . . . by software modules residing within the instruction memory unit 632 for execution by the library processor 628." Accordingly, the Applicants respectfully submit that the originally filed specification adequately describes "converting, via the library, at least a portion of the selected text in corresponding audio," as recited in claim 1, and therefore, does not constitute new matter.

For similar reasons, the Applicants submit that claims 8, 11, 22, 29, 32, 43 and 51 are also supported by the originally filed specification.

For at least the above reasons, the Applicants respectfully request withdrawal of the 35 U.S.C. 112, first paragraph, rejection.

Claim Rejection -- 35 U.S.C. 103

Claims 1-5, 8-13, 22-26, 29-34, 43-54, and 59-62 are rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,438,233 to Yoshimune et al. (hereinafter "Yoshimune") in view of U.S. Patent No. 5,157,783 to Anderson et al. (hereinafter "Anderson") and further in view of U.S. Patent No. 6,115,482 to Sears et al. (hereinafter "Sears"). Claims 2-3, 45-46 and 53-54 are rejected under 35 U.S.C. 103(a) as being unpatentable over Yoshimune in view of Anderson in further view of Sears and further in view of U.S. Patent No. 5,208,745 to Quentin et al. (hereinafter "Quentin"). Claims 6 and 27 are rejected under 35 U.S.C. 103(a) as being unpatentable over Yoshimune in view of Anderson in further view of Sears and further in view of U.S. Patent No. 5,663,748 to Huffman et al. (hereinafter "Huffman"). To the extent the rejections remain applicable to the claims as amended, the Applicants respectfully traverse the rejections as follows.

The Applicants submit that the applied references, alone or in combination, fail to disclose or suggest a method for providing text-to-audio conversion of an electronic book displayed on a viewer, the method including at least the following combination of features: "receiving a selection of an electronic book for viewing from a list of available electronic books stored in an operations center, wherein the operations center is remote from the viewer; receiving, at the viewer, the selected electronic book from the operations center; storing the selected electronic book in a library within the viewer; displaying a page of the selected electronic book on the viewer, the page including text; receiving a selection of text on the displayed page to be provided in audio; receiving a

selection from a menu with an option for text to audio conversion; and converting, via the library, at least a portion of the selected text into corresponding audio,” as recited in amended claim 1.

The Office Action relies on Sears as disclosing “where the displayed electronic text materials are ‘provided as audio’.” See, Office Action at pages 3 and 5. Sears discloses, in col. 5, line 46-col. 6, line 13, an optical-input print reading device where “the user places printed information into the field of view of the camera assembly” and “indicates the text to be read through pointer gestures.” Sears further discloses, in col. 6, lines 12-14, that the “text to be read is converted to speech during speech synthesis 63.”

The cited portions of Sears, however, do not disclose or suggest at least “displaying a page of the selected electronic book on the viewer, the page including text; receiving a selection of text on the displayed page to be provided in audio; receiving a selection from a menu with an option for text to audio conversion; and converting, via the library, at least a portion of the selected text into corresponding audio,” as recited in amended claim 1. In contrast, Sears discloses placing printed information into the field of view of the camera assembly and indicating the text to be read through gestures.

Moreover, the cited portions of Sears fail to disclose or suggest at least “converting, via the library, at least a portion of the selected text into corresponding audio,” as recited in amended claim 1.

The cited portions of Yoshimune, Anderson, Quentin, and Huffman fail to disclose the above features.

For at least the above reasons, the Applicants submit that claim 1 is allowable over the cited references. For similar reasons, the Applicants submit that claims 8, 11, 22, 29, 32 and 43 are also allowable over the cited references.

As claims 1, 8, 11, 22, 29, 32, 43 and 51 are allowable, the Applicants submit that claims 2-6, 9-10, 12-13, 23-27, 30-31, 33-34, 44-50, 52-54, and 59-62, which depend from claims 1, 8, 11, 22, 29, 32, 43 and 51, respectively, are likewise allowable over the cited references, as well as for the additional features recited therein.

Conclusion

In view of the foregoing, the Applicants respectfully request reconsideration of the application, withdrawal of the outstanding rejections, allowance of Claims 1-6, 8-13, 22-27, 29-34, 43-54 and 59-62, and the prompt issuance of a Notice of Allowability.

Should the Examiner believe anything further is desirable in order to place this application in better condition for allowance, the Examiner is requested to contact the undersigned at the telephone number listed below.

In the event this paper is not considered to be timely filed, the Applicants respectfully petition for an appropriate extension of time. Any fees for such an extension, together with any additional fees that may be due with respect to this paper, may be charged to counsel's Deposit Account No. 01-2300, **referencing attorney docket number 033033-00014.**

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Tiffany J. Brooks", written over a horizontal line.

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